APPENDIX B

Issue Dispositioning Screening

Use Figure 1 and the below listed questions to determine if a finding has sufficient significance to warrant further analysis or documentation. The decision points in the process outlined in Figure 1 are discussed in detail below.

A. Performance Deficiency Question

A founding principal of the reactor oversight assessment process is that only those issues that are determined by the staff to be licensee performance deficiencies are entered into the licensee performance assessment process. Therefore, an issue must be a "performance deficiency" before it can be considered a finding.

If the issue is not a performance deficiency, it may still require NRC action outside of the Reactor Oversight Process (ROP) and should be addressed by other agency means as appropriate (e.g., generic communications). However, if the issue is a greater than minor violation of NRC requirements, it must be documented in accordance with applicable Enforcement Policy. These issues are rare and should be evaluated with close management oversight on a case-by-case basis.

B. Enforcement Questions

Certain issues are documented under all circumstances, even if the issue is minor. A positive response to any of the following questions require that the issue be documented as a finding. Findings related to traditional enforcement are expected to be a small fraction of all findings. The significance of these findings should be assessed by NRC management. Typically, a Severity Level would be assigned after consideration of appropriate factors for the particular regulatory process violation in accordance with the NRC Enforcement Policy. Therefore, these findings should also be evaluated by the Significance Determination Process (SDP), if applicable, in order to consider the associated risk significance of the finding prior to assigning a severity level. If evaluated by an SDP the significance color should be entered into the IMC 0305 Operating Reactor Assessment Program action matrix in parallel with enforcement actions.

1. Does the issue have actual safety consequence (e.g.: overexposure, actual radiation release greater than 10 CFR Part 20 limits)?

2. Does the issue have the potential for impacting the NRC's ability to perform its regulatory function? For example, a failure to provide complete and accurate information or failure to receive NRC approval for a change in licensee activity, or failure to notify NRC of changes in licensee activities , or failure to perform 10 CFR 50.59 analyses etc. (see Enforcement Policy IV.A.3)

3. Are there any willful aspects of the violation?

If the answer to any of the enforcement questions is "Yes" the finding should first be discussed with regional management and may be referred to the Office of Enforcement for

assignment of a Severity Level. If all answers to the above questions are "No", the inspector should next determine whether the finding is minor.

C. Minor Questions

The inspector should first compare the finding to those findings identified in Appendix E to determine whether the finding is minor. If the finding is similar to the minor findings identified, the issue should be considered minor. If the guidance in Appendix E is not applicable or is not useful for the specific finding, the inspector should then attempt to answer each of the below questions. Answering "Yes" to any of the below questions indicates that the finding should be documented as greater than minor.

1. Could the finding be reasonably viewed as a precursor to a significant event?
2. If left uncorrected would the finding become a more significant safety concern?
3. Does the finding relate to performance indicators (PI) that would have caused the PI to exceed a threshold?
4. Is the finding associated with one of the below cornerstone attributes and does the finding affect the associated cornerstone objective?

If the answer is "No" to all of the above questions, the finding should be considered minor. If the finding is associated with a below listed attribute, but did not affect the respective cornerstone objective, the finding should be considered minor. If the cornerstone objective is affected, the finding is greater than minor and warrants documenting.

In all cases, minor findings should have no actual safety consequences, little to no potential to impact safety, no impact on the regulatory process, and no willfulness. If the finding is determined to be minor, the inspector should not document the finding.

CORNERSTONE OBJECTIVES AND ATTRIBUTES:

| REACTOR SAFETY STRATEGIC PERFORMANCE AREA

| Initiating Events Cornerstone: OBJECTIVE: to limit the likelihood of those events that upset plant stability and challenge critical safety functions during shutdown as well as power operations.

Attributes:	
Design Control:	Initial Design and Plant Modifications
Protection Against External Factors:	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Switchyard Activities, Grid Stability
Configuration Control:	Shutdown Equipment Lineup, Operating Equipment lineup,
Equipment Performance:	Availability, Reliability, Maintenance; Barrier Integrity (SGTR, ISLOCA, LOCA (S,M,L), Refueling/fuel handling equipment
Procedure Quality:	Procedure Adequacy

Human Performance:	Human Error

Mitigating Systems Cornerstone : OBJECTIVE: to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). |

Attributes:

Design Control:	Initial Design and Plant Modifications
Protection Against External Factors:	Flood Hazard, Fire, Loss of Heat Sink, Toxic Hazard, Seismic
Configuration Control:	Shutdown Equipment Lineup, Operating Equipment Lineup,
Equipment Performance:	Availability, Reliability
Procedure Quality:	Operating (Post Event) Procedure (AOPs, SOPs, EOPs); Maintenance and Testing (Pre-event) Procedures
Human Performance:	Human Error (Post Event), Human Error (Pre-event)

Barrier Integrity Cornerstone: OBJECTIVE: to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radio nuclide releases caused by accidents or events. |

(Maintain Functionality of Fuel Cladding)

Attributes:

Design Control:	Physics Testing; Core Design Analysis (Thermal limits, Core Operating Limit Report, Reload Analysis, 10 CFR50.46)
Configuration Control:	Reactivity Control (Control Rod Position, Reactor Manipulation, Reactor Control Systems); Primary Chemistry Control; Core Configuration (loading)
Cladding Performance:	Loose Parts (Common Cause Issues); RCS Activity Level
Procedure Quality:	Procedures which could impact cladding
Human Performance:	Procedure Adherence (FME, Core Loading, Physics Testing, Vessel; Assembly, Chemistry, Reactor Manipulation); FME Loose Parts, Common Cause Issues

(Maintain functionality of RCS)

Attributes:

Design Control:	Plant Modifications
Configuration Control:	System Alignment; Primary Secondary Chemistry

RCS Equipment and Barrier

Performance:	RCS Leakage; Active Components of Boundary(valves, seals); ISI Results
Procedure Quality:	Routine OPS/Maintenance procedures; EOPs and related Normal Procedures invoked by EOPs
Human Performance:	Routine OPS/Maintenance Performance; Post Accident or Event Performance

(Maintain Functionality of Containment)
Attributes:

Design Control:	Plant Modifications; Structural Integrity; Operational Capability
Configuration Control:	Containment Boundary Preserved; Containment Design Parameters Maintained
SSC and Barrier Performance:	S/G Tube Integrity, ISLOCA Prevention; Containment Isolation SSC Reliability /Availability, Risk Important Systems Function
Procedure Quality:	Emergency Operating Procedures; Risk important Procedures (OPS, Maintenance, Surveillance)
Human Performance:	Post Accident or Event Performance; Routine OPS/Maintenance Performance

| Emergency Preparedness Cornerstone: OBJECTIVE: To ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency.

Attributes:

ERO Readiness:	Duty Roster; ERO Augmentation System; ERO Augmentation Testing; Training
Facilities and Equipment:	ANS Testing; Maintenance Surveillance and Testing of Facilities, Equipment and Communications Systems; Availability of ANS, Use in Drills and Exercises.
Procedure Quality:	EAL Changes, Plan Changes; Use in Drills and Exercises;
RO Performance:	Program Elements Meet 50.47(b) Planning Standards, Actual Event Response; Training, Drills, Exercises
Offsite EP:	FEMA Evaluation

| RADIATION SAFETY STRATEGIC PERFORMANCE AREA

| Occupational Radiation Safety Cornerstone: OBJECTIVE: to ensure the adequate protection of the worker health and safety from exposure to radiation from radioactive material during routine civilian nuclear reactor operation.

Attributes:
Plant Facilities/Equipment

and Instrumentation:	Plant Equipment, ARM Cals & Availability, Source Term Control; Procedures (Radiation and Maintenance)
Program & Process:	Procedures (HPT, Rad Worker, ALARA); Exposure/Contamination Control and Monitoring (Monitoring and RP Controls); ALARA Planning (Management Goals, Measures - Projected Dose)
Human Performance:	Training (Contractor HPT Quals, Radiation Worker Training, Proficiency)

Public Radiation Safety Cornerstone: OBJECTIVE: to ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain as a result of routine civilian nuclear reactor operation.

Attributes:

Plant Facilities/Equipment and Instrumentation:	Process radiation Monitors (RMS) (Modifications, Calibrations, Reliability, Availability), REMP Equipment, Meteorology Equipment, Transportation Packaging; Procedures (Design/Modifications, Equipment Calculations, Transportation Packages, Counting Labs)
Program & Process:	Procedures; (Process RMS &REMP, Effluent Measurement OC, Transportation Program, Material Release, Meteorological Program, Dose Estimates); Exposure and Radioactivity Material Monitoring and Control (Projected Offsite Dose, Abnormal Release, DOT Package Radiation Limits, Measured Dose)
Human Performance:	Training (Technician Qualifications, Radiation & Chemical Technician Performance

SAFEGUARDS STRATEGIC PERFORMANCE AREAS

Physical Protection Cornerstone: OBJECTIVE: to provide adequate assurance that the physical protection system can protect against the design basis threat of radiological sabotage.

Attributes:

Physical Protection System:	Protected Areas (Barriers and Alarms, Assessment); Vital Areas (Barriers and Alarms, Assessment)

Access Authorization System:	Personnel Screening; Behavior Observations; Fitness for Duty
Access Control System:	Search; Identification
Response to Contingency Events:	Protective Strategy; Implementation of Protective Strategy

C. SDP Question

Can the finding be evaluated using the SDP?

If the finding can be processed by the applicable SDP, it should be assigned a color, and documented in the inspection report. Questions for each cornerstone are provided below as an aid in identifying the correct SDP that may be applicable, however the governing SDP guidance is found in IMC 0609.

| REACTOR SAFETY STRATEGIC PERFORMANCE AREA

CORNERSTONES — Initiating Events, Mitigating Systems, & Barrier Integrity

(1) Is the finding associated with an increase in the likelihood of an initiating event?
(2) Is the finding associated with the operability, availability, reliability, or function of a system or train in a mitigating system?
(3) Is the finding associated with the integrity of fuel cladding, the reactor coolant system, reactor containment or control room envelope?
(4) Is the finding associated with degraded conditions that could concurrently influence any mitigation equipment and an initiating event?
(5) Is the finding associated with or involve impairment or degradation of a fire protection feature?

Emergency Planning :

(1) Is the finding associated with a failure to meet or implement a regulatory requirement?
(2) Is the finding associated with a drill or exercise critique problem?
(3) Is the finding associated with an actual event implementation problem?

Operator Requalification:

(1) Is the finding related to licensee's grading of exams?
(2) Is the finding related to written exams?
(3) Is the finding related to an individual operating test?
(4) Is the finding related to simulator fidelity?
(5) Is the finding related to simulator scenario quality?
(6) Is the finding related to scenario security?
(7) Is the finding related to crew performance?
(8) Is the finding related to operator pass/fail rate?
(9) Is the finding related to operator license conditions?

| RADIATION SAFETY STRATEGIC PERFORMANCE AREA

CORNERSTONE — Occupational (ALARA):

(1) Does the occurrence involve a failure to maintain or implement, to the extent practical, procedures or engineering controls, needed to achieve occupational doses that are ALARA*, and that resulted in unplanned, unintended occupational collective dose for a work activity?

[1] (2) Does the occurrence involve an individual worker(s) unplanned, unintended dose(s) that resulted from actions or conditions contrary to licensee procedures, radiation work permit, technical specifications or NRC regulations?

(3) Does the occurrence involve an individual worker(s) unplanned, unintended dose(s) or potential of such a dose (resulting from actions or conditions contrary to licensee procedures, radiation work permit, technical specifications or NRC regulations) which could have been significantly greater as a result of a single minor, reasonable alteration of the circumstances?

(4) Does the occurrence involve conditions contrary to licensee procedures, technical specifications or NRC regulations which impact radiation monitors, instrumentation and/or personnel dosimetry, related to measuring worker dose?

CORNERSTONE — Public

(1) Does the finding involve an occurrence in the licensee's radiological effluent monitoring program that is contrary to NRC regulations or the licensee's TS, Offsite Dose Calculation Manual (ODCM), or procedures?

(2) Does the finding involve an occurrence in the licensee's radiological environmental monitoring program that is contrary to NRC regulations or the licensee's TS, ODCM, or procedures?

(3) Does the finding involve an occurrence in the licensee's radioactive material control program that is contrary to NRC regulations or the licensee's procedures?

(4) Does the finding involve an occurrence in the licensee's radioactive material transportation program that is contrary to NRC or Department of Transportation (DOT) regulations or licensee procedures?

SAFEGUARDS STRATEGIC PERFORMANCE AREA

CORNERSTONE — Physical Protection

(1) Is the finding associated with or involve a failure to meet the requirements of 10 CFR 73.55 (b)-(h), or associated plans, procedure or rules?

(2) Is the finding associated with or impact any key attribute of the Physical Protection Cornerstone to meet its intended function whether in performance, design or implementation?

D. Non-SDP Findings

[1] "Yes" answer to this question does not necessarily indicate a violation of the requirement in 10 CFR Part 20.1101 (b). Compliance will be judged on whether the licensee has incorporated measures to track and, if necessary, to reduce exposures (e.g., whether the findings indicate an ALARA program breakdown).

The non-SDP finding shall, as a minimum, be reviewed by a member of NRC management familiar with NRC requirements in the area inspected to ensure that the finding is greater than minor and not greater than very low safety significance. This review shall ensure that inspector's findings are consistent with NRC policies and requirements and that enforcement-related findings are addressed in accordance with the NRC Enforcement Policy and the NRC Enforcement Manual. Examples of these findings typically involve concerns relating to (1) the collection or reporting of performance indicators that would have caused a PI to exceed a threshold, (2) documenting a finding necessary to close an open item such as a licensee event report, (3) technical information relating directly to an issue of agency-wide concern (i.e., generic safety issues), and (4) other greater than minor findings related to NRC requirements where no SDP exists.

E. Non-Performance Deficiencies

Issues which are determined not to be licensee performance deficiencies, but which constitute a violation of NRC requirements must be documented in accordance with applicable sections of the Enforcement Policy. This includes a determination that the violation is greater than minor and may also warrant enforcement discretion per Section 06.03.a.4 of this Chapter.

FIGURE 1
Issue Dispositioning Screening